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*Attorneys for OAG Defendants
Alex Bravo and Patrick Moreda*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD W. COLLINS,

Plaintiff,

v.

TANISHA M. HENRY, *et al.*,

Defendants.

Case No. 2:23-cv-01812-GMN-MDC

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD FOR
DEFENDANT
TANISHA MUIRHEAD-HENRY**

Aaron D. Ford, Nevada Attorney General, and Samuel L. Pezone, Jr., Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby move to withdraw as counsel of record for Defendant Tanisha Muirhead-Henry.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND

On or about July 19, 2024, undersigned counsel received authorization from Defendant Tanisha Muirhead-Henry for the Office of the Attorney General to represent her in this action, and to file an Acceptance of Service and a Motion to Dismiss on her behalf. *See* ECF No. 26

On August 1, 2024, Plaintiff filed what appeared to be a letter dated July 22, 2024, from firm Hutchinson & Steffen, PLLC, indicating that they had been retained by Henry to represent her in this action. Undersigned counsel inquired with Henry, who confirmed that she had retained Hutchison & Steffen as of July 22, 2024. Upon request, Henry

1 executed a written waiver/declination of further representation by the Office of the
2 Attorney General. Thereafter, attorneys from Hutchinson & Steffen filed a notice of
3 appearance on Henry's behalf. ECF No. 33.

4 **II. LEGAL ARGUMENT**

5 Pursuant to LR IA 11-6(b), an attorney seeking to withdraw "after appearing a case
6 must file a motion or stipulation and serve on the affected client and opposing counsel."
7 Under the Nevada Rules of Professional Conduct, a lawyer must withdraw and terminate
8 representation if, among other reasons, "[t]he lawyer is discharged." Nev. R. Prof. Cond.
9 1.16(a)(3).

10 Undersigned counsel and the Office of the Attorney General were discharged by
11 Defendant Henry as of August 6, 2024. Accordingly, undersigned counsel and the Office of
12 the Attorney General respectfully request that this Court grant leave to withdraw as
13 counsel of record for Defendant Henry.

14 DATED this 12th day of August, 2024.

15 AARON D. FORD
16 Attorney General

17 By: /s/ Samuel L. Pezone, Jr.
18 SAMUEL L. PEZONE, JR. (Bar No. 15978)
Deputy Attorney General

19 *Attorneys for OAG Defendants*
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on August 12, 2024, I electronically filed the foregoing **MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT TANISHA MUIRHEAD-HENRY** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada to the following:

Ronald Collins, #67184
High Desert State Prison
P.O. Box 650
Indian Springs, Nevada 89070
Plaintiff, Pro Se

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Attorneys for Defendant Tanisha Muirhead Henry, R.N.

Tanisha Muirhead Henry
Address Filed Under Seal at ECF No. 20

/s/ Andrea Beckett
ANDREA BECKETT, an employee of the
Office of the Nevada Attorney General

IT IS SO ORDERED.


Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 09-16-24